

PLANNING STATEMENT, including COMMUNITY ENGAGEMENT STATEMENT

FEB 2021

PROJECT: PROPOSAL FOR RENEWAL OF MARBLE HILL PLAYCENTRES BUILDINGS
AND LANDSCAPE

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1.0 INTRODUCTION AND SUMMARY POSITION

1.1 This planning statement has been prepared to support a full application for the redevelopment of the Marble Hill Playcentres in Marble Hill Park.

1.2 The scope of the proposed development is to create a Unique Child Centred Hub. It comprises demolition of the existing structures at the Marble Hill Playcentres and replacement with new child-focused inclusive community hub with facilities for baby, child and Special Needs support where user groups are able to share bespoke accommodation in an environment that embraces natural surroundings. It is health-promoting, encourages self-development and social skills through play and learning, and also through music. In recognising that child and parental pressures and dysfunction affect each other, it addresses the wider problems of development and child rearing, such as stress and life crisis, and is holistic in its approach. The design is based on researched principles on therapy and health enhancing design.

1.3 Full Planning Permission is sought and takes into consideration the long-established nature of the existing facilities, carefully thought-about development on Metropolitan Open Land and the very special circumstances of this development, as well as the incredible community-wide support already received for this project.

2.0 PROJECT BACKGROUND

2.1 The Charity

Marble Hill Playcentres (MHPC) is a long established charity operating child and family play and education (Early Years) services in Marble Hill Park, Twickenham. It is known for its One O'Clock Club (babies and mothers), Adventure Playground (5-15 years) and Nursery (0 up to 5 years). The setting in a beautiful park with a large play area is a rare and much valued asset, but the premises are elderly and need urgent renewal. Marble Hill Playcentres is comprised of the One O'Clock Club, the Adventure Playground, the Inclusive Play Project, and a Nursery Tenant:

One O'Clock Club (OOC): The facility has underpinned the health and needs of mothers and babies for several generations, providing vital mutual support and socialising as well as early years play and development. Babies and children are aged 0 to 5 and mothers with babies up to 11 months have free access. There are play workers every day during opening hours. On Saturday it opens with the 10 O'Clock Club 10-12, and the One O'Clock Club runs Monday to Friday 1pm to 5pm from April - September.

Adventure Playground (AP): This is a flexible play area for children aged 5-15, the space is internal and external with wooden structures that provide life lessons and testing limits. It offers activities from April to September after school as well as weekends and holidays.

The Inclusive Play Project: Running every Saturday morning throughout the year, the Inclusive Play Project offers children with disabilities or additional needs time to explore the Adventure Playground with their families. No bookings are required and the sessions are completely free. For children ages 0 - 15 years.

2.2 Nursery Tenant: The nursery tenant is a bilingual Montessori serving ages 2-5 years and operates 8am to 6pm. It fosters love of nature, independence, respect for rule of law, equality and inclusion, resilience and independence.

2.3 The Playcentres facility has underpinned early years support in the locality for generations, providing vital support to parents and an environment of learning through play and challenge. It has been a key part of our community for over 40 years and a charity for the last 20 years. Our users are from diverse backgrounds and Marble Hill Playcentres draws us all together in the shared experience of parenthood and play. We charge an affordable rate for Marble Hill Playcentres and free passes are available for those receiving certain benefits or with additional needs.

2.4 There is a pressing need in Richmond upon Thames for nursery facilities, aggravated by closures. There is also a dire shortage of child and young adult Special Education and General Special Needs (e.g. SEND, EIS and SN). The charity plans to replace the elderly buildings with new bespoke facilities for all these user groups and assist SN charities without proper facilities by also accommodating them. The decision to continue to include a Nursery in the space is discussed in Section 5.0 of the Design & Access statement and also reference in the Very Special Circumstances document.

2.5 The plans bring together 3 charities (see 2.11) whose efforts will be enhanced by working together efficiently, able to provide much more to the community through co-ordination and collaboration with each other and other local organisations. The new facilities will meet new regulations and licensing requirements and cater for cognitive, behavioural and physical disabilities, in a highly sustainable building which is truly inclusive for all of the community. It will offer music and art therapy and nurture social and motor skills as well as mental health. A hallmark of the building will be its low carbon footprint, its emphasis on health for children and families and the opportunity it presents to educate and inspire the next generation to protect the environment.

2.6 The proposal is a community-led project, run by borough residents donating time and effort in community liaison and fundraising, and aided in launch by professional experts in the Borough donating time. This has achieved early finance to lodge this planning application, and if approved, make an application for full finance from funding charities, corporations and Lottery.

2.7 The project has, to date, involved no subsidy from Central Government or County or Borough Council and has enjoyed enormous support of MPs and Councillors, the community at large and consulting bodies. This current stage has been enormously assisted by the Hampton Fund and private local donation. A full background to verification of extreme need and support from expert agencies and community leaders is contained in the Very Special Circumstances Report (VSC) that accompanies this application.

2.8 English Heritage own the land occupied by the Marble Hill Playcentres and have pledged their support for the project. See letters in Appendices 41, 42.

2.9 The current occupiers (One O'Clock Club, Adventure Playground and Nursery tenant) will be joined by two important SEND and SN charities: Otakar Kraus Music Trust (OKMT) and Skylarks (formerly Me Too & Co). The unique combination of charities will provide child education and play with parental support from ages 0 to 15 (and in the case of OKMT involvement to age 35.)

2.10 The Site and Current Buildings

2.10.1 The current four buildings were never intended for child use, but were originally erected as maintenance facilities for the park in the early 1960's. They have no insulation, have exposed services, no installed heating and rotting timber. One room is simply polythene sheet walls. The split into two larger and two narrow and small buildings compromises efficiency,

supervision and core uses. A professional assessment concludes that the buildings are inappropriate facilities and beyond useful life. Various cost studies covered in the Very Special Circumstances Report demonstrate that repair is not impossible and uneconomic and un-fundable; and an enlarged replacement is the only viable possibility.

2.10.2 The playcentres are situated in wooded surroundings in Marble Hill Park, off Richmond Road Twickenham, on English Heritage land. Its setting is unique, being surrounded by wooded walks and park and in sight of the River Thames. It benefits from a large and safe car park adjacent, and is served by excellent bus services. The green space is managed by rangers and has a 10-year management plan just approved covering buildings, trees and ecology. As a consequence it is a healthy and green zone rich in wild life. It currently provides play and nursery uses across a spectrum of ages. The external areas are an intrinsic part of the facility acting in conjunction with the internal areas. The external use of space extends under supervision to the use of the whole park.

2.11 The Proposed Renewal

2.11.1 The proposed renewal of the play centre has been prompted by a review in 2017 which indicated that comprehensive renewal was necessary due to a range of pressures - from financial to practical. English Heritage have shared this view. The current size and scope of the centre and inadequate and low quality buildings well beyond their design intention are a main source of these pressures. The board of trustees of Marble Hill Playcentres has worked to establish the best way forward for the charity and the opportunity to renew the space and expand its usage is the chosen path forward.

2.11.2 The expansion of use has been achieved by bringing together three charities who will work together to create a new home for themselves: the Marble Hill Playcentres, Skylarks and Otakar Kraus Music Trust. Both Skylarks and OKMT are looking for new homes and by bringing the three charities together, the impact of their work will be magnified. The additional charities are described below:

2.11.3 Skylarks: The charity provides support and information for parents with children and young adults with any Additional Needs and disabilities aged 0-19 years. It runs workshops, provides therapies and training and drop-in sessions and has book-in-advance activities. It currently rents space on a shared basis in the community hall at the Crossway Centre, 100 metres from the park.

2.11.4 Otakar Kraus Music Trust (OKMT): The charity provides music therapy and music projects for children, young people and adults with physical, learning, neurological or psychological difficulties. It aims to provide lasting benefits to children and adults marginalised due to communication difficulties. Set up in 1991 and based in Twickenham it aims to build partnerships, improve awareness of disability and the benefits of music therapy. Besides Richmond upon Thames, the charity already works with Richmond, Hounslow, Ealing and West London Mental Health Trust as outreach projects. In music therapy the therapist and child improvise music together where emotion can be expressed. The use of wind instruments and the choirs help develop breathing techniques, and all instruments and cooperative work aid understanding and production of rhythm, repetition, performing, writing and recording music. All assist communication. There are music groups for ages 16-35 and two youth choirs for ages 5-11 and 12-25.

2.11.5 Working together in the same space will give each charity the opportunity to magnify the impact of their missions. For example: Music therapy can be more readily provided for the children at Skylarks, outdoor space and adventurous play facilities can be adapted for children with additional needs, disadvantaged local families who use the playcentres can access the music therapy facilities of OKMT. In addition, the new space could provide increased opportunities for other charities and community organisations to bring their offer to all local families. See Draft Community Use Agreement at Appendix 59 and Space Sharing and Use Draft Proposal at Appendix 60.

2.11.6 The new facility will provide general care, play and learning with additional SEND, (Special Education Needs), SN (Special Needs), EIS (Early Intervention Support), Emotional and Social Difficulty (BEDS) and communication and interaction difficulty-Autistic Spectrum Disability (ASD).

2.11.7 As the VSC Report demonstrates, provision is an absolute priority nationally and in the Borough, but suffers from lack of facilities and severe funding constraints. The Borough Councillor Brown has recently written to the Secretary of State on this.

2.11.8 Cognitive and physical disability requires special accommodation. Skylarks has to use non-specific shared accommodation in the Crossways building adjacent to St Stephen's Church close by these proposals, and OKMT has sought special accommodation for a long time, needing to vacate its current location. Both charities need specific tailored floor space, special therapy and learning areas, safe car parking for disability and good and secure open space.

2.11.9 Besides increasing the overall critical mass and improved financial operation, the important benefit gained through the inclusion of these charities is the unlocking of funding for the whole scheme.

3.0 PRE-APPLICATION COMMENTS

3.1 A meeting was held with the Council Planning Officer on 14th February 2019 to review the proposals. The use and need were recognised. The principle issue was building in MOL and whether the size of the extension and a first floor was acceptable. On the latter issue a one and a half floor (e.g. a mezzanine, or rooms in the roof) was mentioned.

3.2 The officer subsequently wrote on behalf of the Council Planning to the Playcentres. (Kreena Patel, 14th February to Planning consultant Bryan Staff) to inform that she had discussed the scheme with a colleague in Policy. The view was expressed that although Very Special Circumstances is a high test to pass, it is not entirely insurmountable. It required the correct approach on demonstrating MOL enhancement and showing benefit to the Council with its specific policies supporting the retention and expansion of such facilities in the Borough. It was also noted that Council support (whether AfC, social services, sport, or other relevant depts.) has helped other applicants in the past.

3.3 It should be noted that after meeting officers considerable effort has been applied to reducing size. The floor area had been in previous proposals 973m² gross internal. This has eventually been reduced to 796m² gross internal floor area by maximising sharing of space (as the planning officers requested and BREEAM sustainability assessment criteria seeks). This consists of 608m² gross internal on the ground floor and 188m² on the first floor.

3.4 As a result of officer comment the building foot print has been reduced as much as possible.

3.5 A meeting was held with the Council Planning Officer and the Area Manager on 27th March 2019. At this meeting, the Council Planning Officer provided feedback on the first draft of this Very Special Circumstances Report to be taken into account before this Report is finalised.

3.6 A preference was expressed by Officers for varied roof height to reduce a monolithic effect. The need for height and preferred dimensions for good music acoustics was discussed and the resultant plan achieves optimum room proportions to deal with hearing disability, reverberation and minimising lower frequency pressure.

3.7 A second meeting occurred on 7 November 2019 and the Draft Validation checklist was explored. The project director emailed a list of planning documentation to the Planning Officer for feedback. In February 2020, a revised list of planning documentation with commentary was received by the Playcentres and addressed.

3.8 It is important to note that the proposals have been amended and reviewed following officer feedback.

4.0 THE EARLIER RELEVANT PLANNING APPLICATION BY ENGLISH HERITAGE

4.1 As discussed in consultation with planning officers this application references Application Ref. 18/2977/FUL for the whole of Marble Hill Park and house which was approved in March 2019. This is because the play group proposals sit within the Park. This covers Traffic, 10 year planning strategy, endangered species, trees, access, Open Space and other relevant aspects.

5.0 COMMUNITY ENGAGEMENT

5.1 Marble Hill Playcentres has engaged the public throughout the planning of this development and there has been significant support from the community.

5.2 An online survey of Playcentre users reached over 800 signatures of support. Locals responded with evidence of overwhelming need for Marble Hill Playcentres' services/facilities – 98% said Marble Hill Playcentre provided a valuable service to the community. The community survey also confirmed (92%) that it would be beneficial to run the services all year around and (94%) that it would be beneficial to have enough indoor space to be able to provide a service when the weather is bad (in the Summer or Winter).

5.3 A website about the project has been launched (www.mhcp.org.uk) and includes the drawings of the proposed development and a request for feedback. All comments received via the website have been positive and include offers to volunteer on the project and 2 online donations.

5.4 External stakeholders

5.4.1 English Heritage: Meetings have been held with English Heritage at senior level, throughout the last year, with assessment of proposals by its experts. English Heritage is fully in support of the proposal. See letters of support in Appendices 40-41.

5.4.2 Richmond Council: all councillors contacted have been fully supportive and multiple letters have been submitted in support of the project, including from MPs. See supporting documentation in Appendices 47-49, 51.

5.4.3 Planning officers have been consulted and continuing liaison has taken place.

5.4.4 Neighbours: Adjoining owners in Beaufort Road and Cambridge Park were consulted (via letters) at an early stage and at multiple junctures in the lead up to planning application, and no objections were received. See letters in Appendices 75-76.

5.5 Events were held to engage the local community and to date none has produced any recorded criticism:

5.5.1 The Open Day in April 2019 with show of drawings and working model of the building had approximately 1000 attendees.

5.5.2 A gathering with 50 attendees from the community viewed drawings on 3rd July 2019.

5.5.3 A fundraising fair on Sept 29th 2019 with drawings and model drew approximately 500 attendees with repeat invites to adjoining inhabitants and the wider community. The drawings and model were on display. At the fair approximately £1800 was raised in support of the project.

5.5.4 An October 7th 2019 meeting was held at York House which included the drawings and model. This event was advertised on the Council website, Council newsletter, via letter to local residents surrounding the park and via social media.

5.6 Borough Associations such as Twickenham and Marble Hill Societies have been consulted and no objections received.

5.7 Important environmental organisations have written their enthusiastic support (such as the Environmental Trust and English Heritage). See Appendices 40-43.

5.8 All preliminary studies and proposals have been discussed with LBRUT officers, Councillors and MP's and Borough Service providers.

5.9 Supporting letters from a wide variety of local organisations can be found at Appendices 52-55.

6.0 PLANNING POLICY POSITION

6.1 The proposed development should be considered in the context of the following national, regional and local planning policy and guidance. The development plan for LB Richmond comprises:

- London Plan (March 2016)
- Richmond Local Plan (July 2018)
- Relevant Supplementary Planning Documents include the following:
- Sustainable Construction Checklist SPD (2016)

6.2 The National Planning Policy Framework (NPPF) (2019) and National Planning Policy Guidance (NPPG) are also material considerations.

6.3 In addition to the above, the site has the following adopted policy designations:

- Conservation Area
- Metropolitan Open Land

- Site of Nature Importance
- Proposed area for tree planting
- Public Open Space
- Thames Policy Area
- Protected View No. 4 and No.5

6.4 The Mayor of London is currently preparing a new London Plan. The 'Intend to Publish' version of the New London Plan was published on 9th December 2019. On 13th March 2020, the Secretary of State for Housing, Communities and Local Government wrote to the Mayor to request changes to the Intend to Publish Plan. Notwithstanding, the Draft New London Plan is at an advanced stage of preparation and hold weight in planning decisions.

6.5 The buildings on site are not listed, however Marble Hill Park is a Listed Park and Garden (Grade II*).

6.6 The Site is located in Flood Zone 1 (low probability of flooding), according to the Environment Agency's online flood map, and Transport for London's website states that the Site has a Public Transport Accessibility Level (PTAL) of 3 (where 0 is the worst and 6a is the best).

7.0 PLANNING ASSESSMENT

Principle of Development

7.1 Land Use

7.1.1 The existing buildings on site are in use as a nursery and no change of use is proposed. The existing buildings on site comprise a total of 201sqm GIA floor area; the proposals seek to increase this by 595sqm to provide additional facilities for the Playcentres.

7.1.2 Policy LP 28 of the adopted Richmond Local Plan states that the Council will work with service providers and developers to ensure the adequate provision of community services and facilities. Part B of the policy states that "Proposals for new or extensions to existing social and community infrastructure will be supported where:

7.1.3 it provides for an identified need;

7.1.4 is of a high quality and inclusive design providing access for all; and

7.1.5 where practicable is provided in multi-use, flexible and adaptable buildings or co-located with other social infrastructure uses which increases public access".

7.1.6 As set out in the 'Very Special Circumstances Statement' the proposals respond to a critical need for SEND services in the Borough. In addition to the provision of SEND services, the Playcentres also provides much needed free access to play and support facilities for low-income families.

7.1.7 In relation to design, the building has been designed to respond to the needs of its intended users whilst appearing sympathetic and discreet. The design approach has incorporated elements which draw from the landscaped setting of the Playcentres whilst providing sufficient space for the required facilities. As a result of its use, the building is fully

accessible. Please see the Design and Access Statement for further details, however it is considered that the building is high quality and inclusive in accordance with the above.

7.1.8 The building has also been designed to be flexible and maximise the use of the asset for the community. The spaces link so that different charities can fold back partitions to throw spaces together and shift-use allows multiple uses. Examples include:

7.1.8.1 Nursery tenant can expand south into part of the One O'Clock floor space and also use One O'Clock external play by arrangement.

7.1.8.2 Skylarks and OKMT can swap the room uses and also expand to utilise some of the flexible large areas in the Adventure Play suite and multi-use room at first floor level.

7.1.8.3 Cookery classes can be expanded into the adjacent multiple use space at first floor which can also be used for dance and movement, choir, general music, drama etc.

7.1.9 Parental advice and staff training has adequate space that ensures the facility builds skills and knowledge in the community.

7.1.10 A community use agreement will be put into effect so that usage of the building can be extended to other charitable or community groups needing local space. See draft Community Use Agreement at Appendix 59.

7.1.11 Therefore, the proposed extension of the playcentre is considered to be acceptable in principle and in accordance with planning policy.

7.2 Metropolitan Open Land

As noted above, the proposals are within designated Metropolitan Open Land.

7.2.1 Paragraph 144 of the NPPF is relevant and states that The borough's Green Belt and Metropolitan Open Land will be protected and retained in predominately open use. Inappropriate development will be refused unless 'very special circumstances' can be demonstrated that clearly outweigh the harm to the Green Belt or Metropolitan Open Land. Very Special Circumstances are not defined within the NPPF.

7.2.2 Policy 7.17 of the London Plan states that "the strongest protection should be given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of MOL". Policy 7.16 of the Plan states that, in relation to the Green Belt, "inappropriate development should be refused, except in very special circumstances".

7.2.3 Policy LP 13 of the Local Plan states that "the borough's Green Belt and Metropolitan Open Land will be protected and retained in predominately open use. Inappropriate development will be refused unless 'very special circumstances' can be demonstrated that clearly outweigh the harm to the Green Belt or Metropolitan Open Land".

7.2.4 Policy G3 of the Draft London Plan states that "development proposals that would harm MOL should be refused. MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt".

7.2.5 The proposals do not fall within the exceptions set out in the NPPF, therefore, the proposals are inappropriate development and will need to demonstrate 'Very Special Circumstances' in accordance with national policy tests.

7.2.6 It is considered that there are significant Very Special Circumstances which clearly outweigh the limited harm to the Metropolitan Open Land. There are explained in detail in the Very Special Circumstances Report but are summarised below.

Overwhelming Need

7.2.7 As explained earlier in this report, there is a significant and pressing need for the services which are provided by the Playcentres including a great need for SEND services in the Borough. Furthermore, in addition to the provision of SEND services, the Playcentres also provides much needed free access to play and support facilities for low-income families. As set out in the VSC Report, the playcentre serves a different function to a typical public play facility and its loss would leave a gap in provision in the Borough where there is a clear and evidenced need.

Current Condition of Facilities

7.2.8 The current buildings are 60 years old and a normal life expectation for such buildings would be 30-40 years. They were built as garaging for Marble Hill Park maintenance vehicles, and as a consequence access and rooms bear no relation to actual need. The buildings have no wall insulation and no installed heating. One room of 18m² is simply created by an external wall of PVC sheet. The total existing internal floor area is 170m² and the gross external 206 m². In addition, the current buildings are low quality and do not add to the appearance of the MOL in this location.

7.2.9 As set out in the Very Special Circumstances Report, the facility is vital to the community and non-viable in its present state. Repair is impractical and unaffordable due to lack of funds, income, and necessary precautionary measures (more about building options is included in the Design & Access Statement.) Repair does not achieve accommodation to meet the current legislative and Best practice standards in terms of space, services and fabric. The VSC report demonstrates the series of costed options that were evaluated: from repair, repair and extension, to new and new expanded. The viability studies demonstrated that the new build project had to be launched to attract serious funding and that required inclusion of Special Needs. This expansion then achieves the necessary critical mass.

Minimal Visual Impact

7.2.10 The requirements for the space are set out in the Very Special Circumstances Report which demonstrates that the extension to the playcentres is the minimum space required to meet the needs of the occupiers, and ensure that the space is able to be used flexibly. As set out in Section 9.0, considerable effort has been applied to reducing the size of the building. The floor area had been in previous proposals 973m² gross internal. This has eventually been reduced to 796m² gross internal floor area by maximising sharing of space.

7.2.11 In addition to the reduction in size of the building, the visual impact has also been minimised by its design. A full Visual Impact Assessment has been provided by Terra Firma. This

concludes that the low nature and sympathetic form of the buildings in appropriate cladding substantially reduces visual impact over what is there presently.

7.2.12 In addition, it should be noted that the proposed building is lower for the most part than the existing and substantially lower than neighbouring buildings, the proposed building lines do not extend further than the spread of the existing buildings and there is no significant loss of non-hard surface.

7.2.13 On the basis of the above, it is considered that there are clear Very Special Circumstances which greatly outweigh any harm to the MOL. For further details please see the Very Special Circumstances Report.

7.3 Heritage

7.3.1 The proposals lie within a sensitive location with regard to heritage. The site is within a Conservation Area, close to a Listed Heritage Asset (Marble Hill House) and within a Grade II* Listed Park and Garden. A Heritage Statement has been prepared by Le Lay Architects and will be submitted with this application. (Appendix 19)

7.3.2 From initial design, the proposals have been discussed with Historic England and English Heritage who are the land manager from whom the buildings are leased. The project has been viewed by HE/EH as complimentary to the purposes of overall renewal, ecology ambitions and replanting embodied in the approved planning application for the Historic House and Park (18/2977/FUL).

7.3.3 Policy LP3 of the Local Plan states that “development will be required to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal”.

7.3.4 In relation to archaeology, Policy LP 7 states that “the Council will seek to protect, enhance and promote its archaeological heritage (both above and below ground), and will encourage its interpretation and presentation to the public. It will take the necessary measures required to safeguard the archaeological remains found, and refuse planning permission where proposals would adversely affect archaeological remains or their setting”.

8.0 TECHNICAL CONSIDERATIONS

8.1 Trees

8.1.1 A full report has been generated by Bernie Harverson on behalf of Terra Firma. See Appendix 10 for the Arboricultural Impact Assessment.

8.1.2 The proposals confine themselves to the existing confines of building extent and predominantly hard surface.

8.1.3 Early discussions took place with the Borough Tree Officer. It was explained by the MHPG that no trees on the site are to be touched and all development is outside the tree crown areas. We confirmed that we will take advice on protecting trees when the current equipment is removed and adapt our plans accordingly.

8.1.4 British Standard on Tree Root Protection Zones BS5837 will be met.

8.1.5 The scheme will complement the English Heritage 10 year management and maintenance Plan approved in the 1918 planning application.

8.2 Ecology

8.2.1 A full ecological assessment has been completed by The Ecology Co-op on behalf of Terra Firma and results have been included in the Landscape Masterplan, LVIA and Landscape statements. See Appendix 11 for specific details.

8.2.2 The 18/2977/FUL planning application had an addendum dated 19/11/18 by foa ecology experts which included immediate proximity around the site in question and may be considered current. In addition new studies are recorded in the Design and Access Statement of the current application. These record the expert assessment that the current buildings have low potential for bats, and that none were recorded in a dusk emergence survey. The studies recorded that no notable protected species were identified. Further expert assessment noted that grass and hardstanding and buildings are of low ecological value. The tree survey concludes that there is no harm to trees.

8.3 No Detrimental Effect on Neighbours

8.3.1 The residences at the north in Beaufort Road and one in Cambridge Park are separated by a maintenance road and high wall and hedging. The development will be no nearer to the homes than the existing.

8.3.2 The external use as a play garden remains as before and was a long-established use many years before the main run of homes were built. The Playcentres and the Nursery already use music in their services, however the area to be used by the OKMT will be comprehensively sound proofed to prevent neighbour disturbance.

8.4 Sound

8.4.1 Acoustic checks of the noise experienced at the house boundaries over 3 months in 2018 and peak use for football adjacent in weekend March 4th 2019 indicate a children's play time level at present of 48-53db. This level rises to 78 decibels and over when the normal Park maintenance mowers pass down the adjacent maintenance lane. The ambient noise of the football matches at the house boundaries is 55- 61 decibels on a continuous basis.

8.4.2 The Playcentre outside play areas will remain in the current use and there is no reason the site generated noise should increase.

8.5 Traffic, Transport and Parking

8.5.1 A parking report has been completed by Vectos with projected user numbers of the proposed development. See Appendix 12.

8.5.2 Reference is made to Planning Application 18/2977/FUL for Marble Hill Park and the submitted supporting Vectos Report dated 7/9/18. See Appendix 13. It covered all traffic and pedestrians into the park in visitor analysis and cars into and leaving the park. It assessed current and future load on and capacity of the car park. Marble Hill Play group traffic is included.

Skylarks, the new facility occupier is also included because they use the car park to access St Stephens Hall Crossways. An addendum dated November 18 2018 states that the car park occupancy will be 89% capacity or 68 places out of 76 between 1pm and 2 pm weekends by 2027-28.

8.5.3 Given that MHPG and Skylarks are all included in this Vectos parking assessment the only excess would be the Otakar Kraus Music Trust. This has a projected usage of 18 places and weekends of 23. Choirs meet monthly. Not all these additional arrivals come by car.

8.5.4 All peak facility usage dovetails around the peaks in the general Park and House use.

8.5.5 The outcome is that impact through increased traffic is negligible compared with the normal traffic load and parking.

8.5.6 A map of the transport system near the Playcentres combined with user data from the survey of over 800 users shows the accessibility of the centre by public transport. (Appendix 14)

9.0 CONCLUSION

9.1 The scheme is wholly compliant with the provisions of planning policy, and clearly demonstrates Very Special Circumstances delivering a wide range of public benefits to the area as explained within this Report. The supporting documents demonstrate that all alternatives have been explored and this is the minimum building to meet the needs. The current uses already satisfy a need in the community but this is now greatly expanded to meet priority needs in planning policy. Public consultation has taken place on a number of fronts, both adjoining owners, borough residents and community societies and there has been 100% support to date; with drawings exhibited on number of occasions for comment. External stakeholders such as English Heritage and the Council (across political parties) have been wholly supportive and cooperative, and the visual impact studies show minimal visual intrusion. This building will be a flagship for special needs, for bringing together the community (ALL GROUPS) and for environmental/sustainable design. It has been a product of the whole community working together - what makes this unique.

9.2 The proposals greatly increase community benefits for child care, early years education and provide priority accommodation for SEND in addition to continuing to support play opportunities for low-income families. They demonstrate complete community backing. The facility will be able to help other initiatives in the Borough and be instrumental in saving valuable organisations.

9.3 The location is spacious, easy to access, and has no traffic and parking issues, the area is nature-filled and pollution-free. It has excellent infrastructure links. The team has demonstrated in the Very Special Circumstances Report that there is no alternative. The case is made that as far as MOL is concerned community benefits greatly outweigh perceived harm, if any.

9.4 This is a vital facility and a rare chance to seize an opportunity to magnify community provision on a unique site and, as a hub in the Borough.

APPENDIX: SUPPORTING DOCUMENTATION being submitted in conjunction with this application includes:

1. Technical Note and Summary Position for Building in MOL Marble Hill Park (Report on Planning Policy issues by Bryan Staff, Create Planning)
2. Very Special Circumstances Report (Martin Habell, Maybourne Projects with MHPC)
3. Design and Access Statement (Martin Habell with MHPC)
4. Site Plan Identifying Land (Buy a Plan)
5. Landscape Statement (Terra Firma)
6. Landscape Proposals (Terra Firma)
7. Landscape and Visual Impact Appraisal (Terra Firma)
8. Photomontage (Terra Firma)
9. Topographic Survey (via Terra Firma)
10. Arboricultural Impact Assessment (Bernie Harverson via Terra Firma)
11. Ecological Assessment (The Ecology Co-op)
12. Car Park Assessment Note (Vectos)
13. Vectos Transport Assessment for English Heritage Marble Hill dated Aug 2018
14. Transport Accessibility of Marble Hill Playcentres
15. Construction Management Plan - draft (Avison Young)
16. BREEAM Pre Assessment Report (Syntegra)
17. Energy Statement (Avison Young)
18. Sustainable Drainage Statement (Avison Young)
19. Heritage Statement (Lelay Architects)
20. Architectural Drawing 1 (Martin Habell): Sketch: Bird's Eye View
21. Architectural Drawing 2 (Martin Habell): Elevations
22. Architectural Drawing 3 (Martin Habell): Ground Floor Plan with detail enlargement
23. Architectural Drawing 4 (Martin Habell): First Floor Plan with detail enlargement
24. Architectural Drawing 5 (Martin Habell): Section Sketch
25. Architectural Drawing 6 (Martin Habell): Sketches: Spaces
26. Architectural Drawing 7 (Martin Habell): Sketches: Park Approach
27. Architectural Drawing 8 (Martin Habell): Sketches: Adventure
28. Architectural Drawing 9 (Martin Habell): Roof Plan
29. Architectural Drawing 10 (Martin Habell): MOL Build Plot
30. Architectural Drawing 11 (Martin Habell): MOL Impact and Key sight lines
31. Architectural Drawing 12 (Martin Habell): MOL and Visual Analysis
32. Architectural Drawing 13 (Martin Habell): Proposal Facts and Dimensions
33. Architectural Drawing 14 (Martin Habell): Existing Features
34. Architectural Drawing 15 (Martin Habell): Section aa 1
35. Architectural Drawing 16 (Martin Habell): Section aa 2
36. Architectural Drawing 17 (Martin Habell): Section aa 3

37. Architectural Drawing 18 (Martin Habell): Section aa 4
38. Architectural Drawing 19 (Martin Habell): Section bb
39. English Heritage Letter of Support dated 17/12/18
40. English Heritage Letter of Support dated 06/03/19
41. Marble Hill Society Letter of Support dated 06/03/19
42. The Environment Trust Letter of Support dated 27/02/19
43. Director of Children's Services Letter of Support dated 12/3/19
44. Managing Director of AfC Letter of Support dated 12/3/19
45. MP Sir Vince Cable Letter of Support dated 22/3/19
46. MP Zac Goldsmith Letter of Support dated 11/3/19
47. Emails of Support from (i) Cllr Michael Wilson, Cabinet Member for Equality, Community and the Voluntary Sector; (ii) Cllr Geoff Acton, Cabinet Member for Business, Economics, Employment and Property; (iii) Cllr Penny Frost, Cabinet Member for Children's Services and Schools, all dated 12/3/19
48. MP's Joint Letter on Need to Secretary of State 21/1/19
49. Leader of Richmond Council (Gareth Roberts) Letter of Support dated 23/9/19
50. Letters of Support from local SEND charities: Small Steps dated 8/3/19, Phyz dated 9/3/19, the Auriga Academy Trust dated 6/3/19, 21&Co dated 10/3/19, RB Mind dated 11/3/19, ADHD Richmond dated 12/3/19, Ruils dated 11/3/19, Richmond MenCap dated 12/3/19
51. Deer Park School Letter of Support dated 5/4/19 and Email from AfC regarding benefit of more early years funded places
52. Richmond Parish Lands Charity Letter of Support dated 6/3/19
53. Hampton Fund Charity Letter of Support dated 6/3/19
54. Richmond Council for Voluntary Services Letter of Support dated 7/3/19
55. "On the Edge" report from HF and RPLC detailing the vulnerable position of local charities dated 2018
56. SEND Funding Letter from Cllr Brown dated July 2019
57. SEND Education Review 2017
58. Local GP Letter of Support dated 5/3/19
59. Draft Community Use Agreement
60. Space Sharing and Use Draft Proposal
61. Condition and Use Assessment of existing buildings dated 1/3/19
62. Quotation Solt for Works to insulate the Adventure Playground for winter use and hire dated 14/09/2018. (Solt)
63. Quotation Portakabins to create the required inside space dated 18/06/18. (Portakabin)
64. Alternative Land Requirements Report dated 8/3/19
65. Jardine & Co Letter regarding lack of alternative sites dated 19/2/19
66. Wild Future Steve Marshall Accessibility Report dated 10/5/19
67. LBRuT Search for Space Email confirming no alternative Council properties available dated 2/5/19
68. OKMT Premises Search
69. Skylarks Premises Search
70. Overview of the Hub Vision for the Playcentres

71. Briefed Area from Tenant Users
72. Testing the Briefed Areas against Good Practice Requirements Report
73. Nursery/Early Years Design Brief from KCC dated November 2011
74. MHPC Letter to neighbouring properties dated 4/1/19
75. MHPC Letter to neighbouring properties dated 19/9/19
76. OKMT VSC Report
77. Skylarks VSC Report
78. MP Munira Wilson Letter of Support

Other supporting references (not included):

- SEND Code of Practice Dept of Education Jan 2015: Guide for Early Years settings Ref DFE 00563. 2012
- Government Paper “Supporting pupils at school with medical conditions” 2015
- Guide for early years settings DFE 00563 2014
- University of Derby. Centre for Educational Research. Dr Oates. R. Staff crisis in nurseries.
- Nursery World Vaughn R. Nov 2017 Nurseries in crisis.
- Ofsted Early Years Register comparing 2015 to 2017